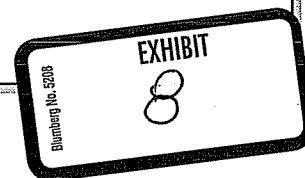


IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)
Plaintiff,)
vs.) 4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al,)
Defendants.)

THE VIDEOTAPED DEPOSITION OF
ROBERT LAWRENCE, M.D., produced as a witness on
behalf of the Defendants in the above styled and
numbered cause, taken on the 23rd day of July, 2008,
in the City of Tulsa, County of Tulsa, State of
Oklahoma, before me, Lisa A. Steinmeyer, a Certified
Shorthand Reporter, duly certified under and by
virtue of the laws of the State of Oklahoma.

TULSA FREELANCE REPORTERS
918-587-2878



1 in paper.

2 MS. XIDIS: It was disclosed with the May
3 15th materials, a list of all the different turkey
4 feed formula medication ingredients for Cargill.

5 This is included with our production of documents on 04:11PM
6 May 15th. It's on the first sheet and then it jumps
7 back to Page 15.

8 MR. RYAN: Thank you.

9 Q Well, let me do it this way: With respect to
10 Tyson or Cobb-Vantress, do you have any information 04:11PM
11 with respect to their use of subtherapeutic
12 antibiotics in the last three years?

13 A I can't make the connection because I
14 literally put the disks in my computer, scanned to
15 look for the presence of antibiotics that was -- and 04:12PM
16 I saw it in some. I think I saw it in most, but I
17 honestly don't have --

18 MR. RYAN: Will this document help?

19 MS. XIDIS: Help you?

20 MR. RYAN: Will it help him answer the 04:12PM
21 question?

22 MS. XIDIS: They're just Bates numbers, so
23 I doubt it.

24 A Let me explain why you may think I'm not
25 adequately informed to answer your question. I was 04:12PM

1 poultry companies in this case would not obey or
2 comply with any regulation or law that was passed by
3 Congress?

4 A I have no reason to believe that they would
5 not.

04:42PM

6 Q You say here, and maybe this is the same
7 reference. Again, I'm trying to discover your
8 information, but you say here, from the records I've
9 reviewed in this case, it's clear that the
10 defendants have used antibiotics in feed as growth
11 promoters. Then you go on to talk about the risk
12 you think that it creates.

04:42PM

13 A Uh-huh.

14 Q Are we talking about the same records that we
15 were earlier that apparently you've reviewed or
16 scanned on your computer that you don't have with
17 you today and can't answer more specific questions
18 if I ask you about individual companies?

04:43PM

19 A That's correct.

20 Q And dates and all that sort of thing?

04:43PM

21 A Yes.

22 Q Now, you know, we talked about this earlier,
23 but you obviously are very familiar with a Pew
24 Commission report and each of its recommendations,
25 correct, and you agree with all of them; right?

04:43PM